

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	
	§	
RIVER ROAD ICE HOUSE LLC	§	CASE NO. 19-52926-RBK
	§	(Chapter 11)
	§	
Debtor	§	

**DEBTOR'S REPSONSE TO MOTION OF UNITED STATES TRUSTEE TO DISMISS
CASE**

TO THE HONORABLE U. S. BANKRUPTCY JUDGE:

Now comes River Road Ice House LLC., Debtor herein, and files this Response to the Motion of the United States Trustee to Dismiss Case (the "Motion") and would show the Court as follows:

1. Debtor admits the allegation in paragraph 1 of the Motion.
2. Debtor admits the allegations in paragraph 2 of the Motion.
3. Debtor admits the allegations in paragraph 3 of the Motion.
4. Debtor admits the allegation listed in the first three sentences of paragraph 4 of the Motion. Debtor denies the allegation in the last sentence. Specifically, Debtor denies the its property is currently scheduled for a foreclosure sale.
5. Debtor denies the allegations in paragraph 5 of the Motion. Debtor has filed the operating reports contemporaneously with this Response.
6. Debtor admits the allegations in paragraph 6 of the Motion.
7. Debtor denies the allegations in paragraph 7 of the Motion.
8. Debtor denies the allegations in paragraph 8 of the Motion.
9. Debtor denies the allegations in paragraph 9 of the Motion.
10. Debtor denies the allegations in paragraph 10 of the Motion.
11. Debtor denies the allegations in paragraph 11 of the Motion.

WHEREFORE, PREMISES CONSIDERED, River Road Ice House LLC. respectfully requests the Court enter an order denying the Motion of the United States Trustee to Dismiss Case, and for such other and further relief in law and in equity as may be just.

Respectfully Submitted,

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By: /s/ Morris E. "Trey" White III
Morris E. "Trey" White III
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CERTIFICATE OF SERVICE

I, Morris E. "Trey" White III, do hereby certify that on April 20, 2020, I mailed a copy of the foregoing document to parties listed on the attached matrix in compliance with Bankruptcy Local Rule 9013(g), by depositing the same in the United States First Class Mail, postage prepaid:

/s/ Morris E. "Trey" White III
Morris E. "Trey" White III